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Los Angeles, California 90017-3012  
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*Attorneys for Defendants Chad Bianco and  
County of Riverside*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

VEM MILLER,

Plaintiff,

v.

CHAD BIANCO, in his individual and  
official capacities; COUNTY OF  
RIVERSIDE, a municipal entity; and  
DOES 1 through 100,

Defendants.

Case No.: 5:25-cv-00629 KK (DTB)

**Declaration of Eugene P. Ramirez in  
Support of Defendants' Motion to  
Dismiss and Special Motion to Strike  
Plaintiff's Second Amended Complaint**

Judge: Hon. Kenly Kiya Kato  
Courtroom: 3  
Date: December 11, 2025  
Time: 9:30 a.m.

Complaint Filed: March 10, 2025  
Trial Date: Not Yet Set

1 I, Eugene P. Ramirez, declare as follows:

2 1. I am an attorney with Manning & Kass, Ellrod, Ramirez, Trester LLP,  
3 counsel for Defendants Chad Bianco and County of Riverside in this action. I submit  
4 this declaration in support of Defendants' motion to dismiss and anti-SLAPP motion  
5 to strike Plaintiff's second amended complaint.

6 2. The facts set forth in this declaration are based on my personal  
7 knowledge and documents maintained by Manning & Kass in the ordinary course of  
8 business. These facts and events are true, or believed by me to be true, and I would  
9 testify competently to them if called upon to do so.

10 3. Defendants' motion is made following a telephonic conference of  
11 counsel pursuant to Civil L.R. 7-3, which took place on September 30, 2025. Yury  
12 A. Kolesnikov and I participated on behalf of Defendants and Ethan Bearman  
13 participated on behalf of Plaintiff. The conference lasted approximately 20 minutes.  
14 During the conference, the parties engaged in thorough discussion of their respective  
15 positions and legal arguments with regard to each cause of action and Defendants'  
16 anticipated motions. Despite their good-faith efforts, the parties were unable to reach  
17 any agreement, thus necessitating the filing of the present motions.

18 4. Plaintiff's second amended complaint ("SAC") challenges a number of  
19 statements allegedly made by Sheriff Bianco at various events without providing the  
20 full context of those statements and by taking many the statements out of context. In  
21 evaluating the merits of Plaintiff's allegations, and in determining whether the anti-  
22 SLAPP statute applies, the Court is required to consider the full context of the  
23 challenged statements. In this case, Plaintiff's SAC quotes from and references five  
24 videos containing Sheriff Bianco's statements. Defendants are hereby manually  
25 lodging the full versions of the pertinent videos with the Court.

26 5. **Exhibit A** is a true and correct copy of the video from the Riverside  
27 County Sheriff's Department's press conference dated October 13, 2024, obtained  
28 from <https://www.youtube.com/watch?v=F1Uj2xaUBWs>.

6. **Exhibit B** is a true and correct copy of the video containing Sheriff Bianco's interview with the Fox News on October 14, 2024, obtained from <https://www.youtube.com/watch?v=Ff30o9N5N2Y>.

7. **Exhibit C** is a true and correct copy of the video containing Sheriff Bianco's interview with the News Nation on October 13, 2024, obtained from <https://rumble.com/v5rqflb-dan-abrams-live-newsnation-bianco.html>.

8. **Exhibit D** is a true and correct copy of the video containing Sheriff Bianco's speech on April 12, 2025, obtained from <https://rumble.com/v6s4373-sheriff-chad-bianco-for-california-governor-apr-12-2025.html>.

9. **Exhibit E** is a true and correct copy of the video containing Sheriff Bianco's appearance on The Britt Mayer Show on April 11, 2025, obtained from <https://www.youtube.com/watch?v=pvaeZVfUicg>.

10. Plaintiff's SAC also references an audio recording of the incident from October 12, 2024. *See* Dkt. No. 41 at ¶ 30. **Exhibit F** is a true and correct copy of the audio recording referenced by Plaintiff in the SAC, obtained from [https://drive.google.com/file/d/14RNILF2sbGvc2\\_SQRlxbqsbJ-Hw8RvhX](https://drive.google.com/file/d/14RNILF2sbGvc2_SQRlxbqsbJ-Hw8RvhX).

11. Attached as **Exhibit G** is a true and correct copy of the misdemeanor complaint filed in *People v. Vem Miller*, Case No. INM2407181 (Cal. Super. Ct., Cnty. of Riverside), on December 18, 2024.

12. Attached as **Exhibit H** is a true and correct copy of the case report for *People v. Vem Miller*, Case No. INM2407181 (Cal. Super. Ct., Cnty. of Riverside), obtained from the Riverside Superior Court website at <https://epublic-access.riverside.courts.ca.gov/public-portal>, on October 3, 2025.

13. Attached as **Exhibit I** is a true and correct copy of the case docket for *People v. Vem Miller*, Case No. INM2407181 (Cal. Super. Ct., Cnty. of Riverside), obtained from the Riverside Superior Court website at <https://epublic-access.riverside.courts.ca.gov/public-portal>, on October 3, 2025.

///

1 I declare under penalty of perjury that the foregoing is true and correct.  
2 Executed on October 10, 2025, in Los Angeles, California.

3 /s/ Eugene P. Ramirez  
4 Eugene P. Ramirez  
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# Exhibit A

(Press Conference Video)

**[LODGED MANUALLY]**

# Exhibit B

(Fox News Video)

**[LODGED MANUALLY]**

# Exhibit C

(News Nation Video)

**[LODGED MANUALLY]**

# Exhibit D

(4/12/25 Video)

**[LODGED MANUALLY]**



# Exhibit E

(Mayer Video)

**[LODGED MANUALLY]**

# Exhibit F

(Plaintiff's audio recording)

**[LODGED MANUALLY]**

# Exhibit G

**CASH BOND**

RECOMMENDED

DEF#1 \$5,000.00

DEF#1 Cite Release: 01/02/2025

MICHAEL A. HESTRIN

DISTRICT ATTORNEY

AGENCY#: C242860022 / RSDC

**FILED**

Superior Court of California  
County of Riverside

**12/18/2024**

CLAUDIA R CARRANZA

**SUPERIOR COURT OF CALIFORNIA**

**COUNTY OF RIVERSIDE**

**INM2407181**

(Indio)

THE PEOPLE OF THE STATE OF  
CALIFORNIA,

Plaintiff,

v.

VEM MILLER

DOB: 10/26/1974

Defendant.

CASE NO.

MISDEMEANOR COMPLAINT

**Misdemeanor DEJ:**

DEF#1 Eligible\_\_\_ Not Eligible X

**COUNT 1**

The undersigned, under penalty of perjury upon information and belief, declares: That the above named defendant(s) VEM MILLER committed a violation of Penal Code section 25850, subdivision (c)(7), a misdemeanor, in that on or about October 12, 2024, in the County of Riverside, State of California, the defendant(s) did willfully and unlawfully carry a loaded firearm on the person and in a vehicle while in a public place and on a public street in an incorporated city and in a prohibited area of unincorporated territory. [1yr.]

**COUNT 2**

That the above named defendant(s) VEM MILLER committed a violation of Vehicle Code section 4000, subdivision (a)(1), an infraction, in that on or about October 12, 2024, in the County of Riverside, State of California, the defendant(s) did willfully, unlawfully and knowingly drive a motor vehicle upon a highway, said motor vehicle not being registered as required by this code.

## MARSY'S LAW

Information contained in the reports being distributed as discovery in this case may contain confidential information protected by Marsy's Law and the amendments to the California Constitution, Article 1, Section 28. Any victim(s) in any above referenced charge(s) is entitled to be free from intimidation, harassment, and abuse. It may be unlawful for defendant(s), defense counsel, and any other person acting on behalf of the defendant(s) to use any information contained in the reports to locate or harass any victim(s) or the victim(s)'s family or to disclose any information that is otherwise privileged and confidential by law.

## DISCOVERY REQUEST

Pursuant to Penal Code section 1054.5, subdivision (b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code section 1054.3.

I declare under penalty of perjury upon information and belief under the laws of the State of California that the foregoing is true and correct.

Dated: December 18, 2024

MICHAEL A. HESTRIN  
District Attorney

By: Nicole Marian  
Deputy District Attorney

# Exhibit H

INM2407181: People vs VEM MILLER  
Misdemeanor  
Larson Justice Center - Department 2K  
Status: Active

PARTIES

PEOPLE OF THE STATE OF CALIFORNIA, COUNTY OF RIVERSIDE	<b>Represented By:</b> Diana Elizabeth Serrano
vs	
VEM MILLER	<b>Represented By:</b> PVT ANGELA FRIEDRICHS

CASE INFORMATION

<b>Custody Status</b>	<b>Case Status</b>	<b>Ordered Bail</b>	<b>Blood Alcohol Level</b>
O.R. Release	Active	\$0.00	
<b>Arrest Number</b>	<b>Arresting Agency</b>	<b>Arrest Date</b>	<b>Filing Date</b>
C242860022	Riverside County Sheriff's Department - (Riverside County) Indio	10/12/2024	12/18/2024
<b>Continuances</b>	5	<b>Age in Days</b>	289
		<b>Last Day for Trial</b>	May 26 2025
<b>60-Day Waiver</b>	60-Day Waiver has not been taken.		

CHARGES

Count	Type	Charge	Description	Severity	Plea	Status
	Arrest	PC 25850 (C) (7)	Carry Loaded Firearm in Public Place	Misdemeanor		
001		PC 25850 (C) (7)	Carry Loaded Firearm in Public Place	Misdemeanor	Not Guilty	Active
002		VC 4000A1	No Evidence Current Registration	Infraction	Not Guilty	Active

REGISTER OF ACTIONS

Date	Action
10/17/2025	Pre-Trial Hearing at 10:30 AM in Department 2K

09/23/2025 Pre-Trial Hearing at 10:30 AM in Department 2K  
Honorable Sylwia Luttrell, Judge  
B. Gabbard, Courtroom Assistant  
Court Reporter: None  
APPEARANCES:  
People represented by Deputy District Attorney, Diana Elizabeth Serrano.  
Special appearance by Jessica Jimenez for Angela Friedrichs.  
Defense counsel appears for defendant pursuant to PC 977.  
Defense motion to continue pursuant to PC 1050 is granted. Motion to continue is not opposed by the People. Hearing continued to 10/17/25 at 10:30 AM in Department 2K. Pursuant to PC 1050(d), the court finds good cause has been shown to grant the continuance. Reason for continuance: Other .  
Defendant waives time for trial plus 45 days.  
Defendant ordered to return on any and all future hearing dates.  
- - Custody Status/Information - -  
Defendant remains released on their own recognizance (O.R.).

09/23/2025 Minute Order: Pre-Trial Hearing

09/23/2025 Request for Continuance Pursuant to PC 1050

07/28/2025 Pre-Trial Hearing at 10:30 AM in Department 2K  
Honorable Sylwia Luttrell, Commissioner  
B. Gabbard, Courtroom Assistant  
Court Reporter: None  
APPEARANCES:  
People represented by Deputy District Attorney, Mallorie Sianai Jones.  
Special appearance by Diana Serrano for Mallorie Jones.  
Special appearance by Forest Wilkerson for Angela Friedrichs.  
Counsel/Parties stipulate the Judge Pro Tem/Commissioner, as indicated above, may hear this matter.  
Defense counsel appears for defendant pursuant to PC 977.  
Defense motion to continue pursuant to PC 1050 is granted. Motion to continue is not opposed by the People. Hearing continued to 09/23/25 at 10:30 AM in Department 2K. Pursuant to PC 1050(d), the court finds good cause has been shown to grant the continuance. Reason for continuance: Other .  
Defendant waives time for trial plus 45 days.  
Defendant ordered to return on any and all future hearing dates.  
- - Custody Status/Information - -  
Defendant remains released on their own recognizance (O.R.).

07/28/2025 Minute Order: Pre-Trial Hearing

07/28/2025 Request for Continuance Pursuant to PC 1050



05/05/2025 Pre-Trial Hearing at 10:30 AM in Department 2K  
Honorable Sylwia Luttrell, Commissioner  
B. Gabbard, Courtroom Assistant  
Court Reporter: None  
APPEARANCES:  
People represented by Deputy District Attorney, Elliott Max Goldberg.  
Special appearance by Miguel Valente for Angela Friedrichs.  
Counsel/Parties stipulate the Judge Pro Tem/Commissioner, as indicated above, may hear this matter.  
Defense counsel appears for defendant pursuant to PC 977.  
Defense motion to continue pursuant to PC 1050 is granted. Motion to continue is not opposed by the People. Hearing continued to 07/28/25 at 10:30 AM in Department 2K. Pursuant to PC 1050(d), the court finds good cause has been shown to grant the continuance. Reason for continuance: Other .  
Defendant waives time for trial plus 45 days.  
Defendant ordered to return on any and all future hearing dates.  
- - Custody Status/Information - -  
Defendant remains released on their own recognizance (O.R.).

05/05/2025 Minute Order: Pre-Trial Hearing

05/05/2025 Request for Continuance Pursuant to PC 1050

03/11/2025 Pre-Trial Hearing at 10:30 AM in Department 2K  
Honorable Sylwia Luttrell, Commissioner  
A. Rodriguez, Courtroom Assistant  
Court Reporter: None  
APPEARANCES:  
Private Counsel PVT ANGELA FRIEDRICHS present in court, representing the defendant.  
Defense counsel appears for defendant pursuant to PC 977.  
Defense motion to continue pursuant to PC 1050 is granted. Motion to continue is not opposed by the People. Hearing continued to 05/05/25 at 10:30 AM in Department 2K. Pursuant to PC 1050(d), the court finds good cause has been shown to grant the continuance. Reason for continuance: Other .  
Defendant waives time for trial plus 45 days.  
The Court did not address the media request.  
Defendant ordered to return on any and all future hearing dates.  
- - Custody Status/Information - -  
Defendant remains released on their own recognizance (O.R.).

03/11/2025 Minute Order: Pre-Trial Hearing

03/11/2025 Request for Continuance Pursuant to PC 1050

03/05/2025 Media Request to Photograph, Record, or Broadcast submitted by

03/03/2025 Media Request to Photograph, Record, or Broadcast submitted by KABC

02/24/2025 Media Request to Photograph, Record, or Broadcast submitted by KESQ

01/03/2025 Protective Order: Law Enforcement Body Worn Camera Evidence filed.

01/02/2025 Order on Media Request to Permit Coverage submitted by NBC Palm Springs filed.  
Order Granted; Judge Dean Benjamini

01/02/2025 Proposed Order re: MEDIA REQ TO PHOTOGRAPH REC for hearing on 01/02/2025  
submitted by NBC 36.1.

01/02/2025 Media Request to Photograph, Record, or Broadcast filed.

01/02/2025 Arraignment at 8:30 AM in Department 2K  
Judicial Officer: None  
Courtroom Assistant: None  
Court Reporter: None  
APPEARANCES:  
No Appearances  
Honorable Judge Dean Benjamini, Presiding  
Courtroom Assistant: A. Rodriguez  
Court reporter was not present for the following proceedings:  
People represented by Deputy District Attorney: DDA Mallorie Jones.  
Defendant represented by PVT Angela Friedrichs.  
Defense counsel appears for Defendant pursuant to 977 PC.  
Defendant's counsel waives formal arraignment.  
Counsel stipulates to advisement of rights.  
Pleads Not Guilty to all charges.  
Discovery provided to defense counsel.  
Defense counsel acknowledges receipt of discovery.  
Pre Trial Hearing set for 03/11/2025 at 10:30 in Dept. 2K.  
Defendant waives time for Trial plus 45 days.  
Defendant ordered to return on any and all future hearing dates.  
- - Custody Status/Information - -  
Released on O.R.  
Pre-trial Services notified that defendant was released or continued on O.R.  
[Blythe and Indio jurisdictions only]

01/02/2025 Legacy Minute Order: Arraignment

01/02/2025 Media Request to Photograph, Record, or Broadcast filed.

12/18/2024 Released on 10/12/24. Appearance date is 01/02/2025.

12/18/2024 Case Designation: Vertical. Case assigned to Dept. 2K

12/18/2024 Electronic - Complaint Filed.

12/18/2024 Electronic - Citation

12/18/2024 EFILE DA INTERFACE ENTRY

# Exhibit I

THE SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

**INM2407181**

Filed Date: **12/18/2024**

Case Status: **Active**

People vs VEM MILLER

**Misdemeanor**

**Indio - Department 2K**

[Print Case Report](#)

[Case Summary.](#)

[Case Summary.](#)

Case Summary

▼ CASE

Filing Date	Violation Date	Case Caption	Case Status	Case Type
12/18/2024	10/12/2024	People vs VEM MILLER	Active	Misdemeanor
Arrest Agency	Arrest Date	Booking Number	Citation Number	
Riverside County Sheriff's Department - (Riverside County) Indio	10/12/2024			
Ordered Bail	Posted Bail			
\$0.00 - Bail not allowed	\$0.00			

▼ COMPLAINTS/PETITIONS

Filings	Represented By	Status	Dispositions
<b>People vs VEM MILLER</b> Misdemeanor Misdemeanor		Active	
<b>Misdemeanor Complaint VEM MILLER</b>		Filed: 12/18/2024	
Petitioner: PEOPLE OF THE STATE OF CALIFORNIA	Diana Elizabeth Serrano		
Defendant: VEM MILLER	PVT ANGELA FRIEDRICHS		

▼ Charges

Charge Information	Degree	BAC	Plea	Status	Severity
Misdemeanor Complaint VEM MILLER - filed on 12/18/2024					
Arrest: 25850(C)(7) PC Carry Loaded Firearm in Public Place					Misdemeanor
Charge - Carry Loaded Firearm in Public Place"> Count 001: 25850(C)(7) PC Carry Loaded Firearm in Public Place (10/12/2024)			Not Guilty (01/02/2025)	Active	Misdemeanor
Charge - No Evidence Current Registration"> Count 002: 4000A1 VC No Evidence Current Registration (10/12/2024)			Not Guilty (01/02/2025)	Active	Infraction

## ▼ HEARINGS

Date	Time	Type	Judicial Officer	Location/Courtroom	Disposition
01/02/2025	08:30 AM	Arraignment		Department 2K	Continued
03/11/2025	10:30 AM	Pre-Trial Hearing	Sylwia Luttrell	Department 2K	Continued
05/05/2025	10:30 AM	Pre-Trial Hearing	Sylwia Luttrell	Department 2K	Continued
07/28/2025	10:30 AM	Pre-Trial Hearing	Sylwia Luttrell	Department 2K	Continued
09/23/2025	10:30 AM	Pre-Trial Hearing		Department 2K	Continued
10/17/2025	10:30 AM	Pre-Trial Hearing	Sylwia Luttrell	Department 2K	

## ▼ DOCUMENTS

[Document Download](#)

Status	Date	Description	Filed By	Confidential
Filed	12/18/2024	Electronic - Complaint Filed.		
Filed	12/18/2024	Electronic - Citation		
Filed	01/02/2025	Media Request to Photograph, Record, or Broadcast filed.		
Generated	01/02/2025	Legacy Minute Order: Arraignment		

Status	Date	Description	Filed By	Confidential
Filed	01/02/2025	Proposed Order re: MEDIA REQ TO PHOTOGRAPH REC for hearing on 01/02/2025 submitted by NBC 36.1.		
Filed	01/02/2025	Media Request to Photograph, Record, or Broadcast filed.		
Filed	01/02/2025	Order on Media Request to Permit Coverage submitted by NBC Palm Springs filed. Order Granted; Judge Dean Benjamini		
Filed	01/03/2025	Protective Order: Law Enforcement Body Worn Camera Evidence filed.		
Filed	02/24/2025	Media Request to Photograph, Record, or Broadcast submitted by KESQ		
Filed	03/03/2025	Media Request to Photograph, Record, or Broadcast submitted by KABC		
Filed	03/05/2025	Media Request to Photograph, Record, or Broadcast submitted by		
Filed	03/11/2025	Request for Continuance Pursuant to PC 1050		
Generated	03/11/2025	Minute Order: Pre-Trial Hearing		
Filed	05/05/2025	Request for Continuance Pursuant to PC 1050		
Generated	05/05/2025	Minute Order: Pre-Trial Hearing		
Filed	07/28/2025	Request for Continuance Pursuant to PC 1050		
Generated	07/28/2025	Minute Order: Pre-Trial Hearing		
Filed	09/23/2025	Request for Continuance Pursuant to PC 1050		
Generated	09/23/2025	Minute Order: Pre-Trial Hearing		

▼ CASE LEDGER

	Amount	Paid	Balance
Fines and Fees Totals	\$0.00	\$0.00	\$0.00
Restitution Totals	\$0.00	\$0.00	\$0.00

Amount due and balance are as of 01/21/2025

[Go Back](#)



**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 801 S. Figueroa St, 15th Floor, Los Angeles, CA 90017-3012.

On October 10, 2025, I served true copies of the following document(s) **Declaration of Eugene P. Ramirez in Support of Defendants' Motion to Dismiss and Special Motion to Strike Plaintiff's Second Amended Complaint** described as on the interested parties in this action as follows:

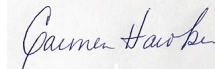
Ethan Bearman, Esq.  
THE BEARMAN FIRM, INC.  
9460 Wilshire Blvd., Suite. 830  
Beverly Hills, CA 90212  
Phone: (747)232-7626  
Direct Phone Line: (747)202-1433  
Email: ethan@thebearmanfirm.com  
miranda@thebearmanfirm.com  
nigelle@thebearmanfirm.com

Attorney for Plaintiff. VEM MILLER

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address carmen.hawkins@manningkass.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on October 10, 2025, at Los Angeles, California.



Carmen Hawkins